

Dear Federal Communications Commission,

Thank you for considering my comments on 99-25.

1. 1,000 watt LPFM service. I feel if 250 watts fits, it should be allowed ANYWHERE and in ANY MARKET across the entire country. Furthermore, I believe the 1,000 watt limitation that Skinner originally proposed, should be allowed. It is in the public interest that if a station's signal can cover a large area with minimum interference, it should be allowed. Many times, such a low wattage of the current 100 watts limitation is not enough to penetrate buildings. While increasing to as much as 1,000 watts would not extend the station's coverage area significantly, but would allow for better saturation and building penetration in the proposed coverage area.

The Community Radio Coalition originally proposed a 250 watt limitation in our original Petition for Rulemaking. The FCC should allow Directional antenna systems in ALL LPFM installations. It would be in the public interest to allow these LPFM signals to be as large as possible provided they do not interfere with other existing signals. If this can be accomplished with directional antenna systems, it should be allowed.

2. Since LPFM is a secondary service which can cause possible LPFM displacement, 2nd adjacent waivers are crucial. 2nd adjacent waivers have been quite successful and LPFM's such as WFKC-LP, have proven to not cause any interference.

3. I agree that LP-10's should not be implemented. 100 watt services have a difficult enough time in covering a large enough population that would support financially, the continued existence of a LP-100. Furthermore, LP-100 are allowed to operate with less wattage. So really, there is no need for a LP-10 service.

4. I feel that one LP-100 license holder should be allowed to own more than one of them in order to chain them for wider coverage, if they are owned in the same market. Perhaps a 3 station limit would be best.

5. Translators should also be allowed to be owned by a LPFM license holder.

6. Keep in mind that if the FCC authorizes translator licenses to also be held by LPFM's license holders, a LPFM licensee should also be allowed to hold multiple LPFM licenses. Multiple licenses are multiple licenses. The service should not matter.

7. I agree that a LPFM licensee should be community based. However, the 10 mile office limit is too restrictive. I believe that a LPFM licensee should be able to operate under the same rules as a full powered station using a 25 mile office/studio distance limit instead of the current 10 mile limit.

8. I believe the 5.3 kilometer limitation currently imposed on LPFM's for minor moves should be lifted and a 15 kilometer move should be allowed instead. There are times where a licensee loses their tower lease and there may not be a suitable location within the 5.3 kilometer distance restriction. This could cause the LPFM to go off the air permanently. 5.3 kilometer minor moves is simply too restrictive.

9. Translators vs. LPFM's. I believe that the FCC should observe first come, first serve. My organization, Spryex Communications, Inc. only applied for one translator. We did not abuse the system. Is it fair that our application should be dismissed in order to allow a LPFM to use a frequency that we have already applied for? It's just not morally right. The market size should not even be considered nor should the LPFM opportunities. The fact that a translator application was received for a specific frequency prior to a LPFM application, the Translator should be processed first.

Thank you for considering my suggestions.